DRAFT EPA Region 9 FY17 Small Public Drinking Water System Action Plan

(Version11/9/1016)

Introduction

Under the Safe Drinking Water Act (SDWA), small community drinking water systems (PWSs) serve no more than 10,000 people and very small systems serve no more than 3,300 people. Across EPA Region 9, there are 4,210 PWSs serving over 52 million people, 3,940 of which are small and serve 3.8 million people. Of the small systems, 3,325 are very small and serve 1.62 million people. The lion shares of these small or very small systems are in California (60%) and Arizona (20 %).

Small systems, serving many of the Region's low-income and disproportionately overburdened communities, often lack sufficient resources and capacity to assure consistent SDWA compliance.[1] This Small Public Water System Action Plan (Plan) recognizes the critical need and urgency to improve the safety of public drinking water supplied to residents, school children and tribal members in these small communities, and builds on ongoing work of EPA's National Drinking Water Action Plan and Environmental Justice 2020 Action Agenda. Specifically, this Plan will focus on reducing exposure to two contaminants with long-term health effects: arsenic and lead. Arsenic is found in the drinking water of many parts of our southwestern states and tribes, and exceedances of the federal Maximum Contaminant Level (MCL) for arsenic represent the number one health-based SDWA violations in the Region. Strengthening protection against lead in drinking water is an EPA national priority.

The four objectives under this Plan are:

OBJECTIVE I: Ensure Small Systems Comply with EPA's Arsenic Standard
OBJECTIVE II: Reduce Exposure to Lead in Small Systems' Drinking Water Supply
OBJECTIVE III: Improve Access to Safe Drinking Water in Schools
OBJECTIVE IV: Improve Access to Safe Drinking Water in Tribal Communities

To achieve sustainable results, Region 9 will enhance oversight of states, step up direct enforcement, provide financial incentives and technical assistance through primacy agencies and in tribal lands, and engage regulatory partners and stakeholders. To ensure consistent outreach to share results, outreach efforts are an integral part of every objective's performance measures.

The Plan will function as a living document, to be regularly updated to reflect new information and input. In addition, the Region will conduct a semiannual review to assess the effectiveness of the Plan and make adjustments as appropriate.

OBJECTIVE I: Ensure Small Systems Comply with EPA's Arsenic Standard

Naturally occurring arsenic appears in many drinking water systems in Region 9. Drinking high levels of arsenic over many years can increase the chance of lung, bladder and skin cancers, heart disease, and neurological damage. On January 22, 2001, EPA reduced the MCL for arsenic from 50 parts per billion (ppb) to 10 ppb. To

[1] As of 2016, the respective national and Region 9 compliance rates with health-based drinking water standards are: 91.3% and 97.6% in for all PWSs; 89.8% and 88.7% for small PWSs; and 89.8% and 87.7% for very small PWSs.

address the particular challenges faced by small systems, EPA made available compliance extensions of up to 14 years through an exemption process, which ended on January 23, 2015.

In December 2014, as the compliance deadline drew near, there were 242 small systems in Arizona, California, Nevada, Navajo Nation (collectively "primacy states"), and tribes under EPA's SDWA direct implementation authority ("DI tribes") with arsenic violations. In response, Region 9 initiated an enforcement effort to put non-compliant small systems "**on a compliance pathway**" (i.e. under an enforcement order with an enforceable "return to compliance" date). For arsenic MCL violations, "**return to compliance**" **("RTC")** means the system has been in compliance with the arsenic running annual average for at least four consecutive quarters.

Our initial effort yielded measurable results. As summarized in Figure 1 below, between January 2015 and August 2016, 101 systems (55% of the total noncompliant systems at the time) were on a compliance pathway, and 78 systems (30% of the total noncompliant systems) returned to compliance. The universe of small systems with arsenic issues is not static, however. Within that same period of time, 19 systems joined the noncompliant list. In addition, cases addressed or resolved during the initial enforcement effort tended to be more straightforward. As enforcement progresses, more challenging and time-consuming cases are expected.

Figure 1: Compliance Status of Small Systems for Arsenic MCL: 1/2015 - 8/2016[2]

Date	AZ	CA	NV	Navajo	DI Tribes	Total
1/2015: Systems in *noncompliance*	20	194	10	8	10	242
8/2016: Systems in noncompliance *(new since 1/2015)*	14 (1 new)	148 (15 new)	8 (1 new)	3	10 (2 new)	183 (19 new)
8/2016: *Systems on compliance pathway*	9	82	5	3	2	101 (92+9)
8/2016: *Systems returned to compliance*						78

Commented [AP1]: Refers to Appendix I, Attachment A table for systems in noncompliance since 8/16 but the numbers are very different. Figure 1 = 101 and the attachment = 45.

For FY17, Region 9 will continue to use enforcement as a key tool to drive arsenic reduction for the majority of noncompliant small systems, supplementing it with non-enforcement options (such as technical and financial assistance), especially for systems that may not be conducive to enforcement.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 1: Strengthen EPA oversight of primacy agencies' enforcement responses and direct actions to accelerate small systems' arsenic compliance.

Action 1A: Track primacy agencies' enforcement responses to arsenic violations on a system-by-system basis to drive results. (Quarterly or more with CA, NV & Navajo Nation; monthly or more with AZ)

- Use a detailed, action-forcing tracking system and regularly scheduled meetings with primacy agencies to:
  - ✓ Verify systems' adherence to required measures and milestones in the prior review period.
  - ✓ Prioritize enforcement action based on the systems: (1) noncompliance duration; (2) arsenic exceedance level; (3) overall profile of compliance, especially with health-based standards; and (4) size and vulnerabilities of populations served.
  - ✓ Confirm actions to put systems on an enforceable compliance schedule.

[2] *See* **Appendix I, Attachment A**: List of Small Systems in Noncompliance with Arsenic MCL as of August 2016.

✓ Review measures for interim sources of drinking water, especially for schools. ✓ Explore non-enforcement tools to reduce arsenic exceedances.
Action 1B: Initiate direct EPA enforcement response to compel compliance. (On-going) • For DI Tribes: Prioritize actions based on the systems: (1) noncompliance duration; (2) arsenic exceedance level; (3) overall profile of compliance, especially with health-based standards; and (4) size and vulnerabilities of populations served. • For Primacy States: Prioritize actions based on a primacy agency's referral or inability or unwillingness to put a system on a compliance pathway.
Action 1C: Enhance monitoring of compliance with active EPA orders.[3] • Conduct regularly scheduled meetings with the system representative to ensure compliance with required corrective measures and milestones. (Quarterly or more) • If the system fails to meet the order's requirements, take additional appropriate enforcement action (such as pursuing penalties or initiating an administrative or judicial action to enforce the order) (Ongoing)
STRATEGY 2: Use non-enforcement tools to reduce arsenic exposure, especially where enforcement is likely ineffective.
Action 2A: Encourage use of the Drinking Water State Revolving Fund (DWSRF) for long-term arsenic solutions, such as new water source, new treatment capacity, or consolidation with a larger PWS. • Identify and track progress of systems slated to address arsenic through DWSRF-funded long-term solutions (Initial list for nine CA small systems completed;[4] biannual updates) • Work with primacy agencies to amplify innovative approaches to incentivize or require consolidation of systems that offer sustainable solutions to small communities' persistent exposure to arsenic in their drinking water.
MEASURES • Increase small systems' "on a compliance pathway" rate from the current 55% to 80% by end of FY17.* *(*This measure takes into account the dynamic nature of small systems' arsenic performance over time and the limitation of enforcement in some instances.)* • Increase non-compliant system's "return to compliance" rate from the current 30% to 45% through FY17 and FY18 with a steady downward noncompliance trend.* *(*This measures takes into account the varying "return to compliance" deadlines under different orders.)* • Conduct outreach for all EPA enforcement actions. • Conduct 2 outreach events to amplify innovations in arsenic reduction for overburdened communities.

OBJECTIVE II: Reduce Exposure to Lead in Small Systems' Drinking Water Supply

Exposure to lead from drinking water can have significant adverse impacts on human health. In children, low levels of exposure have been linked to damage to the nervous system, learning disabilities, impaired growth and hearing, and impaired blood cell formation and function. Under EPA's Lead and Copper Rule (LCR), if there are **action level exceedances or ALEs** for lead (i.e., when lead concentrations exceed an action level of 15 ppb in more than 10 percent of customer taps sampled), the system must undertake a number of additional actions including optimizing corrosion control treatment, notifying the public, and replacing portions of lead service lines controlled by the utility.

Commented [KJ2]: In light of the discussion in the corresponding tables on monitoring (see comments there), this may be a good place to explain the stepped-up monitoring and return to standard monitoring requirements.

[3] See **Appendix I**, **Attachment B**: List of Active EPA Orders, Milestones and Deadlines as of August 2016.
[4] See **Appendix I**, **Attachment C**: List of Drinking Water State Revolving Fund Projects in California.

In Region 9, small PWSs have a relatively high rate of compliance with the LCR. Out of the 3,940 small systems, 32 in Arizona and California have historical ALEs, of which 13 are school PWSs. There are 44 small systems with current ALEs for lead in Arizona, California, Nevada, CNMI, and tribes, of which 12 are school PWSs.

For FY17, Region 9 will conduct target files reviews of those with historical ALEs as the most effective way to determine if the primary agencies are properly implementing the LCR in their supervision of the systems, enhance engagements with primacy agencies to bring systems with current lead ALEs to below the action level, and provide technical training directly to states, utilities and technical assistance providers to improve corrosion control treatment.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 3: Enhance oversight of primacy agencies and small systems with historical or current lead ALEs to ensure timely and proper implementation of Lead and Copper Rule requirements.
Action 3A. Review primacy agencies lead file[5] of 17 small PWSs (8 in AZ and 9 in CA) with multiple historical ALEs[6] to verify proper and timely implementation of LCR requirements. (This number excludes 13 school PWSs, addressed in Objective III.) (AZ: 3/31/17; CA: 6/30/17) • Conduct file review to determine if a primacy agency is making proper LCR compliance determinations for systems under its supervision and reporting accurate water system inventory and compliance data to EPA. • Prepare written findings and recommendations • Work with primacy agencies on a program improvement plan to address findings and recommendations.
Action 3B. Engage with primacy agencies to address 23 small PWSs (12 in AZ, 10 in CA, 1 in NV and 4 in Northern Mariana Islands)[7] with current lead ALEs. (This number excludes 12 school PWSs, addressed in Objective III.) • Conduct semiannual assessments of the 23 small systems. (3/31/17 & 9/30/17) • Follow up with increased oversight, requirements for enhanced reporting, and EPA technical assistance to help primacy agencies remedy ALEs. • Develop semiannual status report on efforts to be below the lead action level. (3/31/17 & 9/30/17)
STRATEGY 4: Provide corrosion control treatment assistance to small PWSs and regulatory agencies in need.
Action 4A. Convene Corrosion Control Treatment Training • Identify agencies or public water systems struggling with corrosion control treatment to participate in training (11/3-4/16). • Convene training for states, technical assistance providers, and public water systems on the development and review of corrosion control treatment plans (11/3-4/16).
MEASURES • Complete reports on file review results for 17 identified systems with historical lead ALEs and have primacy agencies follow through with recommended improvements. • Complete semiannual reports on 23 identified systems with current lead ALEs and bring the systems' lead level below the action level. • Convene 2 one-day corrosion control training workshops, with attendance by priority systems. • Conduct public/media outreach for systems that achieve LCR compliance.

[5] See **Appendix II, Attachment A**: Region 9 Public Drinking Water System File Review Protocol.
[6] See **Appendix II, Attachment B**: List of Small PWSs with Historical Lead ALEs.
[7] See **Appendix II, Attachment C**, for state and tribal PWSs with current ALEs

OBJECTIVE III: Improve Access to Safe Drinking Water in Schools

The EPA Office of Water's FY16-17 National Water Program Guidance emphasizes protecting populations at risk with a specific emphasis on children's health. Schools (including daycare facilities) may operate their own drinking water systems and be regulated as PWSs by the SDWA (School PWSs); or they may only be customers of PWSs and thus not subject to the SDWA.

There are 632 small School PWSs across Region 9, with current data showing 24 of them in California and on tribal lands as having arsenic exceedances, 13 in Arizona and California as having historical lead ALEs, and 12 in Arizona, California, and Nevada as having current lead ALEs. For these school PWSs, we will ensure provision of drinking water that meets the federal arsenic and lead requirements by employing a combination of oversight, enforcement and technical assistance measures parallel to those for Objectives I and II, as well as emphasizing funding for alternative water if necessary.

Most schools in Region 9 are located in buildings that receive their drinking water from PWSs. For these schools, sampling for lead in water from corroded pipes and fixtures is not required under the LCR.[8] Many states, including California and Nevada, are establishing programs for testing and remediation of lead in school drinking water. We will work with primacy agencies to support adequate tap sampling and work with states and utilities to respond to ALEs for lead.

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 5: Reduce children's exposure to arsenic in drinking water supplied by School PWSs or other small systems through enhanced oversight, enforcement, funding, and technical assistance.
Action 5A. Return School PWSs with arsenic exceedances[9] to compliance through both enforcement and non-enforcement tools as discussed in Actions 1A through 1D above. **Action 5B. Leverage resources to return School PWSs with arsenic exceedances to compliance.** *(need to cross-walk with enforcement division. Since enforcement division is doing 5A – how does 5B fit into the picture?)* • Target National Technical Assistance grant funds to assist school PWSs with arsenic violations. (12/31/16) • Work with primacy agencies to negotiate the terms of technical assistance provider work plans that focus on returning school PWSs to compliance. (12/31/16) • Leverage Drinking Water State Revolving Funds to bring school PWSs with arsenic violations back into compliance. (XXX)
Action 5C. Return community water suppliers of schools with arsenic exceedances to compliance through both enforcement and non-enforcement tools as discussed in Actions 1A through 1D above. *(Do we know which non-compliant CWSs are serving schools? How do we prioritize our enforcement action based on vulnerable populations if we don't have the info?)*
STRATEGY 6: Reduce children's exposure to lead in drinking water of School PWSs through enhanced oversight of primacy agencies or monitoring and supporting tap sampling at schools served by PWSs.

Commented [AP3]: Do we control this? Can we be more clear?

[8] The current LCR targets single family residences that are likely to have the highest risk for lead exposure. Many states, including California and Nevada, are establishing programs for testing and remediation of lead in school drinking water.

[9] See **Appendix I**, **Attachment A**, for list of School PWSs with arsenic violations (highlighted in xxxx – pick a color) .

Action 6A. Conduct file reviews of the 12 School PWSs (3 in AZ and 9 in CA) with multiple historical ALEs[10] and verify proper implementation of LCR requirements. (AZ: 3/31/17; CA: 6/30/17)

Action 6B. Ensure that the 12 School PWSs (4 in AZ, 7 in CA and 1 in NV) with current lead ALEs[11] receive interim provision of alternative water.

- Determine whether interim alternative drinking water is provided to the 12 School PWSs with current lead ALEs. *(11/01/16 – should already have happened – confirm and merge with next bullet?)*
- Engage schools to provide alternative drinking water until the PWSs fall below the lead action level. (XX)

Action 6C. Identify and address lead in school taps and fountains s served by PWSs in primacy states.
The current LCR targets single family residences that are likely to have the highest risk for lead exposure; it does not require the PWSs to sample for lead in water from corroded pipes and fixtures in schools. However, many states, including *(How about Arizona or its small systems plan?* California and Nevada, are establishing programs for testing and remediation of lead in school drinking water.

- **California:** Monitor state efforts under the school tap sample initiative and provide technical support for tap sampling of public schools. (xxx)
- **Nevada:** Oversee Nevada's testing for lead in 408 elementary and pre-K facilities via EPA's multi-purpose grant ($89K) under the school tap sampling initiative. (xxx)

Action 6D. Identify and address lead in school taps and fountains served by PWSs in DI tribes. *(See Objective IV for other actions to address safe drinking water in tribal communities)*
[Are there tribal school PWSs? If so, are they of concern? Do we know the universe of schools served by PWSs in DI tribes?]

- Work with tribes to identify candidate schools for lead sampling based on such factors ad age of facility and existence of prior sampling. (12/1/2016)
- Develop a lead sampling strategy. (3/1/2017)
- Develop a notification *[notification to whom? Parents, etc?]* and quality assurance project plan for tribal schools. (5/1/17)
- Conduct lead sampling in schools in coordination with tribal utilities by leveraging available resources (e.g., *[are there sources other than c rider/]* EPA's circuit rider). (Begin 7/1/2017)
- Conduct additional oversight and engagement with utilities and schools where results are above the lead action level *[to do what?]*. (Q4 of FY17 and FY18)

MEASURES

- All School PWSs with arsenic exceedances as of August 2016 are either on a compliance pathway, have returned to compliance, or are supplied with interim alternative water. [*cross walk with enforcement division]*
- Complete file reviews and issue reports with recommendations for 12 school PWSs with multiple historical ALEs.
- Verify compliance status of 12 school PWSs with historical ALEs.
- Interim alternative drinking water is provided to all school PWSs with lead ALEs, where not currently provided.
- Tap sampling in state and tribal schools served by PWSs is completed.
- Additional oversight is provided for PWSs serving schools where ALEs are detected.
- Kick-off event on schools with technical assistance providers.
- Organize and hold school tap sampling kick-off events in California and Nevada.
- Potential groundbreaking/press event for tribal drinking water infrastructure project.

[10] See **Appendix II, Attachment B**, for list of 12 school PWSs with historical lead ALEs.
[11] See **Appendix III, Attachment B**, for list of school PWSs with current ALEs.

OBJECTIVE IV: Improve Access to Safe Drinking Water in Tribal Communities

[Need some context – such as how many systems & populations served?] I assume we are excluding NN since it has primacy, correct?) In Region 9, nearly 62% of tribal populations are served by small drinking water systems with almost 37% served by very small systems.
[What is the relevant funding picture – we talked about EPA funded assistance and set asides?]

STRATEGIES, ACTIONS AND MEASURES

STRATEGY 7: Protect tribal communities from exposure to arsenic and lead in drinking water through enhanced oversight, enforcement, funding, and technical assistance.
Action 7A. Return the 10 tribal systems with current arsenic MCL violations[12] to compliance. (Need to cross-walk w enforcement division.) • Return the 10 non-compliant tribal systems (including 2 school PWSs) to compliance or put them on a compliance path with the arsenic MCL using a combination of Region 9 oversight, EPA-funded technical assistance, Drinking Water Tribal Set-Aside infrastructure funds and enforcement. (9/30/17)
Action 7B. Ensure the five tribal systems with current lead ALEs[13] take timely actions to bring the lead below the action level and have, if necessary, EPA-approved optimal corrosion control treatment. (9/30/17)
Action 7C. Review 289 site sampling plans for adequacy and ability to identify risks *[what risks? such as?].* • Work with EPA-funded circuit rider and tribal utilities to ensure site sampling plans are current and compliant with the LCR, Revised Total Coliform Rule, and Disinfection Byproducts Rules. (50% of plans approved by 2/1/2017; 90% of plans approved by 9/30/2017)
MEASURES • Arsenic levels of the 10 identified tribal systems have returned to compliance or are on a path to compliance with the arsenic MCL. • Lead levels of five identified tribal systems with lead ALEs have returned to below or are on the path to be below the lead action level. • 90% of tribal system sampling plans (289) are approved by end of FY17. • Public outreach for all EPA enforcement actions. *[anything else?]*

[12] See **Appendix I, Attachment A**, for a list of tribal and tribal school PWSs not in compliance for arsenic.
[13] See **Appendix II, Attachment C**, for a list of tribal systems with lead ALEs.

APPENDIX I (ARSENIC) *SUBSTITUTE WITH ENFORCEMENT D'S LIST*

Attachment A

Arizona Water Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
	PWS ID	**PWS Name**	**County**	**Pop**	**Arsenic RAA (mg/L)**	**Status**
1	AZ0402033	Tombstone City of	Cochise	887	0.010	System has new well w/no arsenic. System reworking blending plan.
2	AZ0404029	Jakes Corner Water System	Gila	35	0.012	State-issued Administrative NOV for failing to comply with CO. ATC fee due by 11/10/16.
3	AZ0407671	Peekaboo Water Coop	Maricopa	100	0.011	System is at the MCL for RAA. Maricopa County AO issued in November 2015.
4	AZ0407677	Valley View Water Company	Maricopa	60	0.010	AO issued in November 2015. System has until May 2017 to meet the arsenic MCL.
5	AZ0408035	TRUXTON CANYON WATER COMPANY	Mohave	2126	0.013	SRF funding obtained. AOC issued. Await RAA. Construction completed.
6	AZ0408149	WHITE HILLS WATER COMPANY UNIT 1	Mohave	46	0.012	Assigned to Case Manager to determine action.
7	AZ0411557	NEW SADDLEBACK VISTA DWID	Pinal	129	0.011	Treatment installed. Await RAA to below the MCL.
8	AZ0413038	LAKE VERDE WATER COMPANY	Yavapai	125	0.010	On SRF project list for funding. Currently under construction for treatment. Estimated completion date: 2/7/17
9	AZ0413425	Rio Verde RV Park	Yavapai	213	0.048	State-issued consent order being revised. Response due by 7/11.
10	AZ0414018	TACNA Water Management Company	Yuma	240	0.024	System in probate. Possible consolidation with Mohawk Utility. When new owner identified, new Order will be drafted.
11	AZ0414098	Sierra Pacific Mobile Man	Yuma	816	0.023	Construction substantially complete. Await lab results to certify.
12	AZ0415023	Wenden DWID	La Paz	750	0.011	Consent order issued. USDA funding approved. Bids for construction underway. State to amend construction timeframes in consent order.
13	AZ0415038	Bouse Worley Water System	La Paz	190	0.01	Private system. Raised own rates. ADEQ working with

Arizona Water Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
	PWS ID	**PWS Name**	**County**	**Pop**	**Arsenic RAA (mg/L)**	**Status**
						system to develop technical options, including treatment.
14	AZ0403021	West Village Water Company	Coconino	220	0.01	RTC 12/19/2014
15	AZ0407660	Shangri La Ranch	Maricopa	160	0.01	RTC 1/8/2016
16	AZ0411712	Antelope Peak DWID	Pinal	60	0.01	RTC
17	AZ0413052	Humboldt Water System	Yavapai	700	0.01	RTC 12/11/2015
18	AZ0413081	Camp Verde School Dist 28	Yavapai	1500	0.01	RTC 9/23/2015
19	AZ0413103	Pine valley Water Company	Yavapai	163	0.01	RTC
20	AZ0413348	Buffalo Run MHP	Yavapai	190	0.01	RTC 9/25/2015
21	AZ0413363	Paulden Mini Mart	Yavapai	14	0.01	RTC 9/30/2015
22	AZ0413419	Mountain View MHP	Yavapai	160	0.01	RTC 7/21/2015
23	AZ0413513	Verde Lakes Water - Stillwater	Yavapai	800	0.01	RTC 12/19/2014
24	AZ0402043	Monte Vista Water Company	Cochise	150	.01	RTC 1/5/2015
Total	24			5690 (9644)*		*Includes RTC systems

Nevada Systems in Noncompliance with Arsenic (August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)						
	PWS ID	**PWS Name**	**County**	**Pop**	**Arsenic RAA (mg/L)**	**Status**
1	NV0000149	Desert Paradise MHP	Clark	70	0.016	Bottled water provided. State-issued AOC. Pursuing POU installation. Will pursue FOAV/AO if owner unwilling to sign amended AOC.
2	NV0000298	LaMoille Valley Plaza	Elko	25	0.023	Pursuing POU installation. Draft AO in staff review.
3	NV0000319	Roark Estates Water Assoc	Clark	62	N/A 0.026	Target RTC: September 2016 DWSRF funded POU treatment installation complete (08/29/16).
4	NV0005028	Shoshone Estates Water Co. Inc.	Nye	240	0.030	State-issued Notice of Formal Enforcement (5/27/16). NDEP has contracted with an assistance provider. Board formerly disbanded 07/15/16. Commission petitioning for receivership.
5	NV0000058	Wildes Manor	Churchill	70	0.017	**Target RTC date:** Bottled water provided. State-compliance order issued 11/20/15.

						Evaluating centralized and POU treatment options. State recommends new well construction.
6	NV0004012	Silver Knolls Mutual Water Co	Washoe	120	0.011	**Target RTC date: June 2016** Sampling returned RAA of PWS to compliance. SOX will show in next SDWIS upload.
TOTAL	6			587		

Navajo Water Systems in Noncompliance with Arsenic
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

	PWS ID	PWS Name	County	Pop	Arsenic RAA (mg/L)	Method (SRF new source, treatment, consolidation)
1	NN-3503028	Toadlena - NTUA	San Juan County, New Mexico	914	0.0161 and 0.0109	**Target RTC date: 12/31/2017** Consolidation underway. NNEPA-issued AOC on 9/23/2013, w/RTC date of 12/31/2017. Toadlena to blend with Narbona Pass water system (PWS ID NN-350301). Physical intertie completed. System awaits installation of 3-phase power.
2	NN-3503057	Mittenrock - NTUA	San Juan County, New Mexico	363	0.0093	**Returned to Compliance.** Mittenrock water system intertied with the NTUA – Sanostee/Tocito water system (PWS ID NN-3503059).
3	NN-4900220	Aneth - NTUA	San Juan County, Utah	1297	0.0208 and 0.0167	**Target RTC date: 12/31/2017** Treatment planned. NNEPA-issued AOC on 3/19/2016 NTUA to construct arsenic treatment plant. Has applied to USDA for approximately $1.9M for treatment system
4	NN-4903017	Red Mesa - NTUA	San Juan County, Utah	958	0.0096	Returned to compliance. USEPA, IHS, and ARRA funds were used to build Sweetwater Pipeline that pipes surface water from the Farmington Rural Water System (PWS ID NN-35300245).
5	NN-4903018	Montezuma Creek - NTUA	San Juan County, Utah	414	0.0087 and 0.01	Target RTC date: 12/31/2017 Treatment underway to address As fluctuations. NNEPA-issued AOC on 5/20/2013, w/RTC date of 12/31/2017. In 2015, USEPA awarded $750K for arsenic treatment. Total estimated cost of plant - $1.3M. Engineering and design of the treatment plant underway. Construction expected - April through November 2017.
6	NN-4903071	Todahaidekano - NTUA	San Juan County, Utah	292	0.0111	Pipeline break in 2015 resulted in return to use of high arsenic level wells. Wells were blended with Farmington surface water via Sweetwater pipeline. Most recent As levels <10 ppb.

7	NN-4903072	Mexican Water - NTUA	San Juan County, Utah	337	0.0133	Pipeline break in 2015 resulted in return to use of high arsenic level wells. Wells were blended with Farmington surface water via Sweetwater pipeline. Most recent As levels <10 ppb. Await additional sampling to provide RAA<10ppb.
TOTAL	7			4575		

Tribal DI Water Systems in Noncompliance with Arsenic
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

	PWS ID	PWS Name	Tribe Name	Pop	Arsenic RAA (mg/L)	Status
1	09-0400106	Polacca	Hopi	2600	0.0170	Village at Hopi Tribe. Long term compliance plan is to connect to a planned regional drinking water system. System under review by EPA.
2	09-0400107	Sipaulovi (Lower Sipaulovi/Lower Mishongnovi)	Hopi	523	0.0178	Village at Hopi Tribe. Long term compliance plan is to connect to a planned regional drinking water system. System under review by EPA.
3	09-0400218	San Miguel CBP	Tohono O'odham Nation	113	0.0111	System under review by EPA.
4	09-0400237	SCUA Soda Canyon	San Carlos Apache	185	0.0652	AOC issued; EPA working with San Carlos to meet compliance measures by 2018.
5	09-0400259	Shungopavi	Hopi	1500	0.0132	Village at Hopi Tribe. Long Term compliance is to connect to a planned regional drinking water system. System under review by EPA.
6	09-0400260	Hopi Cultural Center	Hopi	325	0.0123	AOC issued; scheduled to meet MCL in June 2020; interim measure: POU/POE
7	09-0400394	Mishongnovi (Upper Sipaulovi/ Upper Mishongnovi	Hopi	450	0.0171	Village at Hopi Tribe. Long term compliance plan is to connect to a planned regional drinking water system. System under review by EPA.
8	09-0400662	BIA San Carlos Forestry	San Carlos Apache	50	0.0155	System under review by EPA
Total	8			5,746		

Attachment B

Region 9 Arsenic SDWA Enforcement Actions as of August 2016

	System	City, State	Population	Arsenic level at the time of the enforcement action	Enforcement action (NOV, AOC,	Interim measures	Date system should meet the MCL

					Order) and date		
1	Arvin CSD	Arvin, CA	20,000	11-30 ppb	CA/FO w/penalty and AOC	Free water/ vending machines	March 2019
2	Hopi Cultural Center	Hopi Tribe	25, Hotel, café, Non-Comm. system	12 ppb	AOC	POU/POE	June 2020
3	Torres Martinez	Torres-Martinez Tribe	266	14 ppb	AOC	Returned to compliance (RTC) in 2015.	RTC in 2015, Consolidation.
4	Pioneertown	Pioneertown, CA	377	50-79 ppb	AOC	Hauled water	Jan. 2017
5	SCUA Soda Canyon	San Carlos Apache Tribe	185	65 ppb RAA (current level)	AOC	*EPA and Tribe in discussions to establish an enforceable RTC schedule.*	*EPA and Tribe in discussions to establish an enforceable RTC schedule.*

Attachment C

Drinking Water State Revolving Fund Arsenic Projects in California						
	PWS ID	**County**	**PWS Name**	**Project Description**	**Total Commitment**	**Milestone**
1	CA1500426	**Techachapi**	**Rosa Villa Apartments**	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	**DWSRF/Prop 84 Total: $1.5M**	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
2	CA1500485		Antelope Valley Mobile Estates	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	**DWSRF/Prop 84 Total: $1.5M**	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
3	CA1500571		Lucky 18 on Rosamond, LLC	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	**DWSRF/Prop 84 Total: $1.5M**	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
4	CA1502231		Rosamond School Water System	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	**DWSRF/Prop 84 Total: $1.5M**	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.

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5	CA1502569		First Mutual Water System	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	**DWSRF/Prop 84 Total: $1.5M**	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
6	CA1502744		60th Street Association Water System	1 of 8 water systems to be consolidated with Rosamond CSD (CA1510018).	**DWSRF/Prop 84 Total: $1.5M**	Planning project expected to complete 12/31/16. Pending review of environmental documents and engineering drawings.
7	CA5010008	**Stockton**	City of Hughson	Project to provide arsenic treatment, new storage and distribution facilities.	**SDWSRF and/or Prop 1 Total Cost: $6.6M**	Funding agreement to be issued early 2017.
8	CA5010009	**Stockton**	Keyes CSD	New arsenic treatment plant + consolidation of 4 small PWSs: - Countryside Mobile Home Estates (CA5000086) - Green Run Mobile Estates (CA5000085) - Mobile Plaza Mobile Home Park, (CA5000051) - Faith Home Teen Ranch (CA5000217) (nitrate violation)	**DWSRF /Prop 1 Total: $18.8M**	**Construction funding agreement expected to be issued XXX Project completion: 2018**
9	CA5210003	**Valley**	LOS MOLINOS COMM. SERVICES DIST.	Project for new well source and transmission line to consolidation New Orchard MHP (CA5200550) and Millstream MHP (CA5201137).	**DWSRF Total Cost: 1.4M**	Construction funding agreement expected to be issued by December 2016.

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APPENDIX II (LEAD)

Attachment A

Region 9 Public Drinking Water System File Review Protocol

(version 10/13/2016)

Objective

To determine whether the primacy agency for the Public Water System Supervision (PWSS) Program is making proper rule compliance determinations and reporting water system inventory and compliance data accurately to the EPA for making appropriate decisions to protect public health.

Background

File reviews generally accompany a comprehensive ***program review***, where EPA evaluates the performance of primacy agency PWSS program management and implementation to include program administration, development, technical assistance and training, enforcement, and data management. However, EPA may choose to conduct standalone file reviews as a primacy agency oversight tool.

The Safe Drinking Water Act requires primacy agencies to report required public water system (PWS) information to EPA each quarter. EPA maintains the information in the national Safe Drinking Water Information System (SDWIS) database. SDWIS includes inventory information for each public water system (name, population served, system type, source characteristics) and violation information (failures to follow monitoring and reporting schedules, meet mandated treatment techniques or MCLs, or notify consumers, and related enforcement information).

File Review Process

Identify PWSs	Stratified random sample set or targeted sample set
Review files	Compare information in water system files against pre-populated EPA regional data capture forms with data retrieved from SDWIS
Document findings	Identify type of data discrepancies (inventory/compliance) Categorize type of discrepancies - Inaccurate (inventory only): system-specific inventory information not recorded accurately in the primacy agency database. - Compliance determination under-reporting: Primacy agency or EPA determines a water system to be in violation but the violation is not recorded in the primacy agency database - Compliance determination over-reporting: a water system file shows no valid violation yet a violation is recorded in the primacy agency database. - Data flow: federally required data recorded in primacy agency database does not migrate successfully to SDWIS/Fed
Prepare report	Document, evaluate and assess findings. Provide EPA recommended actions. Work with primacy agency to address file review findings and prioritize EPA recommended actions for follow up in a program improvement plan.

Attachment B

Arizona Small PWSs with Historical Lead ALEs as of June, 2016			
#	PWS ID	PWS Name	No. of historical multiple ALEs or 2 consecutive ALEs over the past 7 years
1	AZ0411705	ADOC Eyman Unit	2
2	AZ0410092	Marana Municipal – Picture Rocks	2
3	AZ0413108	Sedona Venture Water Company	2
4	AZ0414009	Valley Vista Water Company	2
5	AZ0412306	Mountain View Campground	2
6	AZ0402112	Naco Water Co – Bisbee	2
7	AZ0404037	Town of Star Valley Water Department	2
8	AZ0415096	Q Mountain Water Company	2
9	AZ0410264	THIM ater Corp 2	2
10	AZ0409013	Porter Creek DWID	2
11	**AZ0413095**	**Oak Creek Elementary School**	**2**
12	AZ0410207	THIM Utility Corporation - VFW	2
13	**AZ0402063**	**Cochise Jr College**	**2**
14	**AZ0414105**	**Orange Grove Elementary School**	**2**
15	AZ0415120	Parker South	2
16	**AZ0409046**	**Holbrook SDA Indian School**	**2**

California Small PWSs with Historical Lead ALEs as of June, 2016			
#	PWS ID	PWS Name	No. of historical multiple ALEs or 2 consecutive ALEs over the past 12 years
1	CA2300644	Woodside RV Park	3+
2	CA3610026	SBDNO County Service Area 70 Cedar Glen	3+
3	CA3610707	USN San Clemente Island	3+
4	CA4200854	Imerys Minerals California Inc	3+
5	**CA4300779**	**Lakeside SD-Lakeside School**	**3+**
6	CA4900508	Cazadero Water Company, Inc	2 consecutive
7	**CA5400624**	**Kings River Elementary School**	**3+**
8	CA5400701	Sequoia Crest Water Company	3+
9	**CA5400795**	**Waukena Elementary School**	**3+**
10	CA5400934	Ponderosa CSD	3+
11	**CA1000112**	**Fairmont School**	**3+**
12	**CA1000276**	**Orange Center School**	**3+**
13	**CA1000315**	**Clay Joint Elementary School**	**3+**
14	CA1010501	NPS-Grant Grove – Fresno District (23)	2 consecutive
15	**CA5800843**	**MJSUD Foothill Intermediate School**	**3+**
16	**CA5800845**	**MJUSD Dobbins School**	**3+**
17	**CA5800847**	**MJUSD Loma Rica School**	**3+**

Attachment C

Arizona Small PWSs with current ALEs for Lead

(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	Pb90 mg/L	Pop	County	Status
1	AZ0402112	Naco WC-Bisbee	0.0047	201	Cochise	**Expect Pb90<AL to be posted 3/31/2017**. 6-month sampling completed and Pb90<AL. State reports partial WQP monitoring done.
2	AZ0404869	USDS TNF Grapevine Campground	.04	30	Gila	**Expect Pb90<AL to be posted 3/31/2017**. Await second round of 6-month sampling, 1st round Pb90<AL. State reports partial WQP monitoring done.
3	AZ0409013	Porter Creek DWID	.07	300	Navajo	**Expect Pb90<AL to be posted 3/31/2017.** Await second round of 6-month sampling, 1st round Pb90<AL. State reports partial WQP monitoring done.
4	AZ0410093	Sandario Water Co.	.023	1062	Pima	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round <Pb90 AL.
5	AZ0411328	Copper Mtn Ranch	0.0164	909	Pinal	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round Pb90<AL.
6	AZ0412306	Mtn view Campground	0.024	145	Santa Cruz	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round Pb90 ND. State reports partial WQP monitoring done.
7	AZ0413108	Sedona Venture Water Co.	0.0654	700	Yavapai	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round Pb90<AL. WQP monitoring completed.
8	AZ0414009	Valley Vista Water	0.0154	300	Yuma	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round Pb90<AL. Partial WQP monitoring done.
9	AZ0414448	Sunset MHP	0.0261	43	Yuma	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round Pb90<AL. Partial WQP monitoring done.
10	AZ0415120	Parker South	0.1	45	La Paz	**Expect Pb90<AL to be posted 3/31/2017** Await second round of 6-month sampling, 1st round Pb90<AL.
11	AZ0407072	Taliesin West	ND	85	Maricopa	**Below Pb90 AL**. Two 6-month sampling completed Pb90<AL.
12	AZ0407900	Sontel Trust Water Co-op	ND	80	Maricopa	**Below Pb90 AL**. PWS had ALE in 2013 but normal 2014 sampling was zero

	Total	12		3900		

California Small PWSs with current ALEs for Lead

(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	Pb90	Pop	Status
1	CA0707573	DELTA MUTUAL WATER COMPANY	0.054	225	**Below Pb90 AL.** Data transmission error.
2	CA1000324	Manning Gardens Care Center Inc	0.026	144	**Earliest possible PB<AL to be posted 3/31/2017** PWS being placed on six-month monitoring
3	CA1500465	Oak Knolls Mutual Water Co	0.045	135	**Earliest possible PB<AL to be posted 3/31/2017** Resampling showed all results below lead action level. System not returned to standard monitoring. Many homes not occupied by the year round residents.
4	CA20000659	CBUSO Mission Bell	0.020	440	**Expect Pb90<AL to be posted 9/31/2016.** System sampled on June 9, 2016 and all sample results were below the AL. They are scheduled to complete a second round before December 31st, 2016. The System completed Public Education (PE) and is on the path to full compliance.
5	CA2000681	Certainteed	0.078	150	**Earliest possible PB<AL to be posted 3/31/2017** System changed out the lead faucet fixtures. Sampling in June 2016. System not returned to standard monitoring. The system notified consumers of the exceedance.
6	CA2000865	MD#58 Sierra Highland	0.020	75	**Earliest possible PB<AL to be posted 3/31/2017** System sampled on 8/17/16 and 8/23/16. Results below the AL. Await next round of samples within 6 months.
7	CA4901144	Cohn Winery	0.02	55	**Earliest possible PB<AL to be posted 3/31/2017** ALE on 1/26/2016. 1st round collected July 2016. Await results.
8	CA4901345	Buckley Family Partnership	0.023	45	**Earliest possible PB<AL to be posted 9/31/2016** ALE on 12/22/215. Await results of six-month set collected on 6/24/2016.
9	CA5200525	North Valley Services	0.174	30	**Below Pb90 AL.** Data transmission error. Pb90 is 12.4ug/L.
10	CA5402050	Milk Specialties Global	0.019	60	**Earliest possible PB<AL to be posted 3/31/2017** Bottled water being provided. 6-month samples collected August 2016.
	Total	10		1104	

Nevada Small PWSs with current ALEs for Lead

(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	Status
1	NV0001103	Marigold Mine Potable Water System	Humboldt	300	**Expect Pb90<AL to be posted 3/31/2017.** Replaced galvanized piping/shut off valves in March 2016. Initial WQP sampling conducted.

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Commented [KJ7]: how many sampling events before the system can return to standard monitoring protocl?

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Commented [KJ9]: then why include?

					Recent sampling (5/5/2016) = 14 ppb. Expect to meet AL with next sampling.
	Total	1		325	

Northern Mariana Island Small PWSs with current ALEs for Lead
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	Status
1	MP	Anaks Condominium		191	**Expect Pb90<AL to be posted 3/31/2017** PWS does not have 2 six-month samples below AL yet. First sample taken in July 2016 was below AL.
2	MP	Aqua Resort Hotel		514	**Expect Pb90<AL to be posted 3/31/2017** PWS does not have 2 six-month samples below AL yet. First sample taken in July 2016 was below AL.
3	MP	Hyatt Hotel Staff Housing		77	**Expect Pb90<AL to be posted 3/31/2017** ALE in Aug. 2013. PWS was back in compliance in Dec. 2013. Primacy agency overlooked putting PWS on 6-month monitoring. PWS took 1st 6-month sample in July 2016 which was below AL.
4	MP	Finasisu Terrace Apartment/Tan Holdings		393	**Below Pb90 AL**. ALE in 2011. Below AL in 2013. Monitoring for two consecutive 6-month periods in 2014 showed levels below AL.
	Total	4			

Tribal DI Small PWSs with current ALEs for Lead
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	Tribe Name	Pop	Status
1	09-0402057	Kitt Peak National Observatory	Tohono O'odham Nation	80	Conducting CCT study
2	09-0605158	Camp Casino (Golden Acorn Casino)	Campo	1000	Changed out fixtures, still above AL; CCT now installed and monitoring is ongoing
3	09-0605164	Big Valley Rancheria Water District	Big Valley Band	3135	Conducting CCT study with FY16 DWTSA funds
4	09-0605128	Round Valley Administration Complex	Covelo Indian Community	100	CCT deemed optimized
5	09-3200161	Washoe Tribe Carson Colony	Washoe	450	On increased monitoring
	Total	5		4,765	

Appendix III (SCHOOLS)

Attachment A

California School PWSs in Noncompliance with Arsenic
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	Status
1	CA0706028	Knightsen Elementary School	Contra Costa	350	**Returned to compliance (7/28/2016).** High arsenic well inactivated.
2	CA1300556	Mulberry Union School	Imperial	85	**Returned to compliance (9/18/2015).** Switched to surface water source.
3	CA1502154	Lakeside School	Kern	800	School on bottled water for past 6 years. State-issued mandatory consolidation letter (June 2016)
4	CA1502231	Rosamond School	Kern	900	School on bottled water. Plans and specifications submitted for consolidation with Rosamond CSD.
5	CA1600008	Central Union Elementary	Kings	320	**Not on bottled water or POU.** Has initiated funding request for a planning study to determine nature of the problem and feasible solutions
6	CA1600017	Island Union School	Kings	300	**Returned to compliance on 4/22/2015.** New source.
7	CA1600048	Kettleman City Elementary	Kings	350	School on bottled water. Will consolidate with Kettleman CSD and return to compliance with Kettleman City.
8	CA2000150	Liberty High School	Madera	1340	**Not on bottled water.** Considering consolidation. Problematic well has been shut off.
9	CA2000612	North Fork Union School*	Madera	350	**Not on bottled water.** Still in planning phase. (*nitrate)
10	CA2700552	Echo Valley School	Monterey	503	**Returned to compliance 3/29/2013.** Treatment installed. .
11	CA2701221	Washington School*	Monterey	250	School on bottled water. Still in planning phase. (*cadmium)
12	CA2702550	Grange Hall Water System	Monterey	25	School on bottled water. Still in planning phase. Next door to Washington School.
13	CA3400371	Arcohe Elementary School	Sacramento	465	**Returned to compliance 3/9/2016**. Levels below arsenic MCL.
14	CA3701010	Warner Unified School	San Diego	250	School on bottled water. Application for construction funding submitted for new well and treatment.
15	CA3901169	MUSD-Nile Garden School	San Joaquin	804	**Not on bottled water.** Application for construction funding submitted.
16	CA50000273	Gratton School	Stanislaus	110	**Not on bottled water**. Application for construction funding submitted for new well and treatment.
17	CA5100145	Winship Elementary	Sutter	38	School on bottled water.

					Application for construction funding submitted for new well
18	CA5100149	Barry Elementary	Sutter	650	School on bottled water. Application for construction funding submitted for consolidation.
19	CA0900210	Millers Hill School	El Dorado	120	School on bottled water. Monitoring fluctuating arsenic levels. **Not in SDWIS/Fed – Arsenic WG tracking.**
20	CA2000785	Valley Teen Ranch	Madera	50	School on bottled water. Application for construction funding submitted for consolidation. **Not in SDWIS/Fed – Arsenic WG tracking.**
21	CA4000774	Pleasant Valley Elementary	San Luis Obispo	150	School on bottled water. Piloting treatment system. Not in SDWIS/Fed – Arsenic WG tracking.
	Total	21		8210	

Tribal School PWSs in Noncompliance with Arsenic

#	PWS ID	PWS Name	Pop	Status	Interim Measures
1	09-0400395	Hopi High School - BIA	1150	EPA Region 9 AOC in 2009. System returned to compliance in 2011. Non-compliance since mid-2015. Latest RAA for arsenic was 16.7 ppb. Recent efforts to optimize pre-treatment/RO processes resulted in improved arsenic removal, with a level of 6.4 ppb in September 2016. EPA will continue to closely monitor system data. Will take 3 quarters of monitoring before the RAA is below the arsenic MCL. ***Projected return to compliance date: 09/2017***	Water currently served meets As standard, thus no interim measures taken.
2	09-0403011	Dzil Libei (Cameron) Elementary School	133	System exceeded arsenic MCL in March 2012. Since 2012, arsenic levels have fluctuated. System has not conducted required monitoring and reporting (M/R) for most contaminants on a consistent basis. In September 2016, the Region 9 Enforcement Division commenced enforcement review. ***Projected return to compliance date: 09/2018***	School on bottled water.
	Total	2			

Navajo Nation School PWSs in Noncompliance with Arsenic
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	As RAA	Status
1	NN-0436006	Dilcon Boarding School - BIA	Navajo, Arizona	473	0.0102	School on bottled water. BIA constructed treatment plant online on 9/18/2015. Experiencing difficulties with acid adjustment.
	Total	1		473		

Attachment B

Arizona School PWSs with current ALEs for Lead
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	Status
1	AZ0409046	Holbrook SDA Indian School	Navajo	109	PWS to complete a CCT study via third-party TA contractor. PWS has posted signs to flush water/fountains and sinks that have elevated lead.
2	AZ0413095	Oak Creek Elementary	Yavapai	250	School on bottled water for past 2 years. PWS to complete a CCT study via third-party TA contractor. School plans to re-plumb building.
3	AZ0414105	Orange Grove Elementary	Yuma	425	PWS to complete a CCT study via third-party TA contractor. PWS has shut off water to classrooms and ordered filters. Custodians and/or teachers flush the water system prior to students' arrival.
4	AZ0407178	Paloma School District 94	Maricopa	125	School on bottled water during Treatment Plant failure, no potable water was delivered to school and all sampling was suspended. CCT project has been approved by ADEQ in 2013. 1st round of 6-month Pb90 results = 0.0018 mg/L
	Total	4		909	

California School PWSs with current ALEs for Lead
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	Status
1	CA1900750	Del Sur School/Westside Union District	Los Angeles	920	**Not on bottled water**. ALE on 3/22/16. Second set of 20 samples taken 4/2014 was <AL. 90th percentile to be recalculated.
2	CA4300779	Lakeside SD-Lakeside School	Santa Clara	110	School on bottled water. Corrosion control study due 3/2017.
3	CA5000116	Roselawn High	Stanislaus	223	**Not on bottled water.** State compliance order to be issued.
4	CA5400795	Waukena Elementary School	Tulare	230	School on bottled water. Taps locked. System pursuing new source due to nitrate and uranium.
5	CA5601405	Santa Clara School	Ventura	59	School on bottled water. ALE in 1998 - 0.555. Old school with lead pipes. On annual monitoring. Lead pipes mainly used for hand-washing.
6	CA5800845	MJUSD Dobbins School	Yuba	85	Not on bottled water. System under state compliance order. Most recent 90th percentile is 0.0157. Recommend File Review
7	CA5800847	MJUSD Loma Rica School	Yuba	150	**Not on bottled water.** 9/14/2015 ALE = 0.023. Three other ALEs since 2004.
	Total	7		1777	

Nevada School PWSs with current ALEs for Lead
(August 2016 SDWIS Fed Data Warehouse – data reported through June 30, 2016)

#	PWS ID	PWS Name	County	Pop	Status

1	NV0001045	Goodsprings School	Clark	300	**Not on bottled water**. Fountains have been locked. Recent sampling (4/28/16) showed lead <AL at 13.6 ppb. Investigating faucet replacements. Expect to meet AL with next sampling.
	Total	1		300	